



Notice of Service of Process

null / ALL
Transmittal Number: 21932898
Date Processed: 08/25/2020

Primary Contact: Cynthia Bertucci
Dollar Tree, Inc.
500 Volvo Pkwy
Chesapeake, VA 23320-1604

Electronic copy provided to: Heather Hunter
JJ Jacobson-Allen

Entity:	Family Dollar Stores of Rhode Island, LLC Entity ID Number 3697603
Entity Served:	Family Dollar Stores of Rhode Island LLC
Title of Action:	Linda Francis vs. Family Dollar Stores of Rhode Island, LLC #08425
Matter Name/ID:	Linda Francis vs. Family Dollar Stores of Rhode Island, LLC #08425 (10461261)
Document(s) Type:	Summons/Complaint
Nature of Action:	Personal Injury
Court/Agency:	Providence County Superior Court, RI
Case/Reference No:	PC-2020-05586
Jurisdiction Served:	Rhode Island
Date Served on CSC:	08/25/2020
Answer or Appearance Due:	20 Days
Originally Served On:	CSC
How Served:	Personal Service
Sender Information:	Wayne G. Resmini 401-751-6655

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To avoid potential delay, please do not send your response to CSC

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

STATE OF RHODE ISLAND AND



PROVIDENCE PLANTATIONS

SUPERIOR COURT

SUMMONS

Plaintiff Linda Francis v. Family Dollar Stores of Rhode Island LLC #08425 Defendant	Civil Action File Number PC-2020-05586 Attorney for the Plaintiff or the Plaintiff Wayne Resmini Address of the Plaintiff's Attorney or the Plaintiff 1022 RESERVOIR AVENUE CRANSTON RI 02910
Licht Judicial Complex Providence/Bristol County 250 Benefit Street Providence RI 02903 (401) 222-3250	Address of the Defendant c/o AFS Corporation Service Company 222 Jefferson Blvd Suite 200 Warwick RI 02888

TO THE DEFENDANT, Family Dollar Stores of Rhode Island LLC #08425:

The above-named Plaintiff has brought an action against you in said Superior Court in the county indicated above. You are hereby summoned and required to serve upon the Plaintiff's attorney, whose address is listed above, an answer to the complaint which is herewith served upon you within twenty (20) days after service of this Summons upon you, exclusive of the day of service.

If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Your answer must also be filed with the court.

As provided in Rule 13(a) of the Superior Court Rules of Civil Procedure, unless the relief demanded in the complaint is for damage arising out of your ownership, maintenance, operation, or control of a motor vehicle, or unless otherwise provided in Rule 13(a), your answer must state as a counterclaim any related claim which you may have against the Plaintiff, or you will thereafter be barred from making such claim in any other action.

This Summons was generated on 8/6/2020.

/s/ Henry Kinch
Clerk

Witness the seal/watermark of the Superior Court

A TRUE COPY ATTEST
 HAROLD OUIMETTE
 Constable #6129
 Date 1 1

08/28/2020 08/24/2020
 SC # 137

STATE OF RHODE ISLAND AND



PROVIDENCE PLANTATIONS

SUPERIOR COURT**Plaintiff**

Linda Francis

v.

Family Dollar Stores of Rhode Island LLC #08425

Defendant**Civil Action File Number**

PC-2020-05586

PROOF OF SERVICE

I hereby certify that on the date below I served a copy of this Summons, complaint, Language Assistance Notice, and all other required documents received herewith upon the Defendant, Family Dollar Stores of Rhode Island LLC #08425, by delivering or leaving said papers in the following manner:

☐ With the Defendant personally.

☐ At the Defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.

Name of person of suitable age and discretion _____

Address of dwelling house or usual place of abode _____

Age _____

Relationship to the Defendant _____

☐ With an agent authorized by appointment or by law to receive service of process.

Name of authorized agent _____

If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

☐ With a guardian or conservator of the Defendant.

Name of person and designation _____

☐ By delivering said papers to the attorney general or an assistant attorney general if serving the state.

☐ Upon a public corporation, body, or authority by delivering said papers to any officer, director, or manager.

Name of person and designation _____

STATE OF RHODE ISLAND AND



PROVIDENCE PLANTATIONS

SUPERIOR COURT

Upon a private corporation, domestic or foreign:

- ☐ By delivering said papers to an officer or a managing or general agent.

Name of person and designation _____

- ☐ By leaving said papers at the office of the corporation with a person employed therein.

Name of person and designation _____

- ☐ By delivering said papers to an agent authorized by appointment or by law to receive service of process.

Name of authorized agent _____

If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

- ☐ I was unable to make service after the following reasonable attempts: _____

SERVICE DATE: _____

Month Day Year

SERVICE FEE \$ _____

Signature of SHERIFF or DEPUTY SHERIFF or CONSTABLE _____

SIGNATURE OF PERSON OTHER THAN A SHERIFF or DEPUTY SHERIFF or CONSTABLE MUST BE NOTARIZED.

Signature _____

State of _____

County of _____

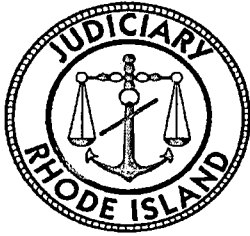
On this _____ day of _____, 20____, before me, the undersigned notary public, personally appeared _____ ☐ personally known to the notary or ☐ proved to the notary through satisfactory evidence of identification, which was _____, to be the person who signed above in my presence, and who swore or affirmed to the notary that the contents of the document are truthful to the best of his or her knowledge.

Notary Public: _____

My commission expires: _____

Notary identification number: _____

See this notice in Cambodian, Spanish, and Portuguese on the attached pages. **Español:** Véase esta notificación en camboyano, español y portugués en las páginas adjuntas. **Português:** Leia esta notificação em cambojano, espanhol e português nas páginas em anexo.



NOTICE

You have a case in the Rhode Island state court system.

You have the right to an interpreter at no cost to you.

Rhode Island Supreme Court Executive Order 2012-05 states that when a Limited-English Proficient (LEP) person appears in court, the Rhode Island Judiciary will provide a free authorized interpreter for the defendant, plaintiff, witness, victim, parent of a juvenile, or someone with a significant interest in the court proceeding. This interpreting service is provided at no cost to the parties and in all types of cases, both civil and criminal. Court interpreters work in all the courthouses of the Rhode Island state court system.

To schedule an interpreter for your day in court, you have the following options:

1. **Call the Office of Court Interpreters at (401) 222-8710, or**
2. **Send an email message to interpreterfeedback@courts.ri.gov, or**
3. **Visit the interpreters' office to schedule an interpreter:**

**The Office of Court Interpreters
Licht Judicial Complex
Fourth Floor, Room 401
250 Benefit Street
Providence, RI 02903**

When requesting an interpreter, please provide the following information:

**The name and number of your case
The language you are requesting
The date and time of your hearing
The location of your hearing
Your name and a telephone number where we can reach you or your lawyer**

For more information in Portuguese, Russian, and Spanish, including a listing of court forms that are available in Spanish, please visit our website on the Internet:

<https://www.courts.ri.gov/Interpreters/englishversion/Pages/default.aspx>.

To request a translation of this notice into any other language, please call the Office of Court Interpreters at (401) 222-8710. It would be helpful to have an English speaker with you when you call.

The Rhode Island Judiciary is committed to making the courts accessible to all.

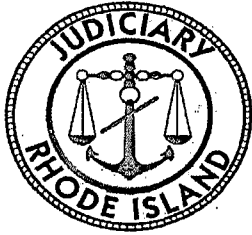
**The Office of Court Interpreters
Licht Judicial Complex Fourth
Floor Room 401
250 Benefit Street
Providence, RI 02903**

See this notice in Cambodian, Spanish, and Portuguese on the attached pages.

Camboyano: SAMPLE: [Véase esta notificación en camboyano, español y portugués en las páginas adjuntas.]

Español: Véase esta notificación en camboyano, español y portugués en las páginas adjuntas.

Português: Leia esta notificação em cambojano, espanhol e português nas páginas em anexo.



NOTIFICAÇÃO

V. Ex.^a tem um processo em curso no sistema judiciário do Estado de Rhode Island,

V. Ex.^a tem direito aos serviços gratuitos de um intérprete.

A Ordem Executiva 2012-05 do Supremo Tribunal de Rhode Island prevê que quando uma pessoa com conhecimentos limitados da língua inglesa (*Limited-English Proficient*) (LEP) comparece em tribunal, a Administração Judiciária de Rhode Island disponibiliza-lhe gratuitamente os serviços de um intérprete autorizado a um réu, autor, testemunha, vítima, pai ou mãe de um menor ou alguém com interesse significativo no processo judicial. O serviço de intérprete é prestado gratuitamente às partes e em todos os tipos de processos, sejam eles civis ou penais. Os intérpretes do tribunal trabalham em todos os tribunais do sistema judiciário do Estado de Rhode Island.

Para agendar os serviços de um intérprete para o seu dia no tribunal, tem as seguintes opções:

1. **Telefonar para o Gabinete de Intérpretes Judiciais através do n.º (401) 222-8710, ou**
2. **Enviar uma mensagem de correio eletrónico para interpreterfeedback@courts.ri.gov, ou**
3. **Deslocar-se ao gabinete de intérpretes para agendar os serviços de um intérprete:**

**Gabinete de Intérpretes Judiciais
Complexo Judicial Licht
Quarto Piso, Sala 401
250 Benefit Street
Providence, RI 02903**

Quando solicitar os serviços de um intérprete deve fornecer os seguintes dados:

- **O nome e número do seu processo**
- **O idioma que solicita**
- **A data e hora da sua audiência**
- **O local da sua audiência**
- **O seu nome e um número de telefone para o podermos contactar a si ou ao seu advogado**

Para obter mais informações em português, russo e espanhol, incluindo uma lista dos formulários judiciais disponíveis em espanhol, visite o nosso website na internet:

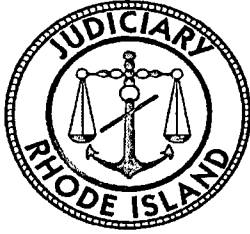
<https://www.courts.ri.gov/Interpreters/englishversion/Pages/default.aspx>.

Para solicitar uma tradução desta notificação para qualquer outro idioma, telefone para o Gabinete de Intérpretes Judiciais através do número (401) 222-8710. Recomenda-se que esteja acompanhado por alguém que fale inglês quando fizer a chamada.

A Administração Judiciária de Rhode Island está empenhada em tornar os tribunais acessíveis para todos.

**Gabinete de Intérpretes Judiciais
Complexo Judicial Licht
Quarto Piso, Sala 401
250 Benefit Street
Providence, RI 02903**

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Español: Véase esta notificación en camboyano, español y portugués en las páginas adjuntas.
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A V I S O

Usted tiene un caso en el sistema judicial de Rhode Island.

Usted tiene el derecho a tener un intérprete sin costo para usted.

La Orden Ejecutiva 2012-05 del Tribunal Supremo de Rhode Island dicta que cuando una persona que tiene un dominio limitado del inglés (LEP) comparece ante la corte, el Sistema Judicial de Rhode Island le proveerá un intérprete autorizado gratis sea el acusado/demandado, demandante, testigo, víctima, padre de un menor de edad alguien que tenga con un interés importante en el proceso de la corte. Este servicio de interpretación se le proveerá sin costo alguno a los participantes en toda clase de caso, sea civil o penal.

Los intérpretes judiciales trabajan en todos los tribunales del Sistema Judicial de Rhode Island.

Para solicitar un intérprete para su comparecencia en el tribunal, usted tiene las siguientes opciones:

1. **Llamar a la Oficina de Intérpretes en el tribunal al 401-222-8710 ;**
2. **Mandar un correo electrónico a interpreterfeedback@courts.ri.gov; o**
3. **Presentarse a la Oficina de Intérpretes para solicitar un intérprete:**

**The Office of Court Interpreters
Licht Judicial Complex
Cuarto Piso, Oficina 401 A-B
250 Benefit Street
Providence, RI 02903**

Al solicitar un intérprete, por favor provea la siguiente información:

- **El nombre y el número de su caso**
- **El idioma que solicita**
- **La fecha y hora de su audiencia**
- **Dónde va a tomar lugar su audiencia**
- **Su nombre y número de teléfono por el cual nos podamos poner en contacto con usted o con su abogado.**

Para obtener más información en portugués, ruso o español, incluyendo una lista de formularios de la corte que están disponibles en español, visite nuestra página de internet:

<https://www.courts.ri.gov/Interpreters/englishversion/Pages/default.aspx>

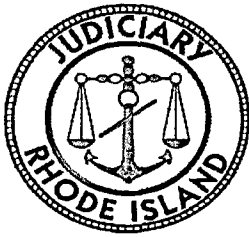
Para solicitar la traducción de este aviso en cualquier otro idioma, por favor llame a la oficina de intérpretes al (401) 222-8710. Ayudaría si usted puede estar en compañía de una persona que habla inglés cuando llame.

El sistema jurídico de Rhode Island se compromete a proporcionar a todas las personas mejor acceso a los tribunales.

**The Office of Court Interpreters
Licht Judicial Complex
Fourth Floor Room 401
250 Benefit Street
Providence, RI 02903**

មើលសេចក្តីជូនដំណឹងនេះជាភាសាខ្មែរ អេស្បាញ និងព័រទុយហ្គាល់នៅលើទំព័រដែលបានភ្ជាប់។

សេចក្តីជូនដំណឹង



លោកអ្នកមានបណ្តឹងនៅក្នុងប្រព័ន្ធតុលាការនៃរដ្ឋ Rhode Island។

លោកអ្នកមានសិទ្ធិស្នើសុំអ្នកបកប្រែដោយឥតគិតថ្លៃសម្រាប់ខ្លួនឯង។

ដីកាប្រតិបត្តិរបស់តុលាការកំពូលនៃ Rhode Island (Rhode Island Supreme Court Executive Order) លេខ 2012-05 បានចែងថានៅពេលបុគ្គលដែលមានចំណេះដឹងផ្នែកភាសាអង់គ្លេសមានកំណត់ (LEP) បង្ហាញខ្លួននៅក្នុងតុលាការ តុលាការនៃ Rhode Island នឹងផ្តល់អ្នកបកប្រែដែលបានអនុញ្ញាតដោយឥតគិតថ្លៃសម្រាប់ចុងចោទ ដើមចោទ សាក្សី ជនរងគ្រោះ មាតាបិតារបស់អនីតិជន ឬនរណាម្នាក់ដែលពាក់ព័ន្ធយ៉ាងសំខាន់នៅក្នុងដំណើរការតុលាការ។ សេវាកម្មបកប្រែនេះ ត្រូវបានផ្តល់ជូនដោយឥតគិតថ្លៃសម្រាប់តួភាគី និងនៅគ្រប់ប្រភេទនៃបណ្តឹង ទាំងរដ្ឋប្បវេណី និងព្រហ្មទណ្ឌ។ អ្នកបកប្រែក្នុងតុលាការធ្វើការនៅក្នុងគ្រប់តុលាការទាំងអស់របស់ប្រព័ន្ធតុលាការនៃរដ្ឋ Rhode Island។ ដើម្បីត្រៀមពេលវេលាអ្នកបកប្រែសម្រាប់ថ្ងៃចូលសវនាការរបស់លោកអ្នក លោកអ្នកមានជម្រើសដូចខាងក្រោម ៖

1. ទូរស័ព្ទមកកាន់ការិយាល័យអ្នកបកប្រែប្រចាំតុលាការតាមរយៈលេខ (401) 222-8710 ឬ
2. ផ្ញើអ៊ីម៉ែលទៅកាន់ interpreterfeedback@courts.ri.gov ឬ
3. ទៅកាន់ការិយាល័យអ្នកបកប្រែដើម្បីត្រៀមពេលវេលាអ្នកបកប្រែ ៖

**The Office of Court Interpreters
Licht Judicial Complex
Fourth Floor, Room 401
250 Benefit Street
Providence, RI 02903**

នៅពេលស្នើសុំអ្នកបកប្រែ សូមផ្តល់នូវព័ត៌មានដូចខាងក្រោម ៖

- ឈ្មោះ និងលេខបណ្តឹងរបស់លោកអ្នក
- ភាសាដែលលោកអ្នកស្នើសុំ
- កាលបរិច្ឆេទ និងម៉ោងសវនាការរបស់លោកអ្នក
- ទីតាំងនៃសវនាការរបស់លោកអ្នក
- ឈ្មោះ និងលេខទូរស័ព្ទលោកអ្នកដែលយើងខ្ញុំអាចទំនាក់ទំនងលោកអ្នក ឬមេធាវីលោកអ្នកបាន

សម្រាប់ព័ត៌មានបន្ថែមជាភាសាព័រទុយហ្គាល់ រូស្ស៊ី និងអេស្បាញ រួមទាំងបញ្ជីទម្រង់បែបបទតុលាការដែលមានជាភាសាអេស្បាញនោះ សូមចូលទៅកាន់គេហទំព័រយើងខ្ញុំនៅលើគ្រឹះស្ថានគណនេយ្យ ៖

<https://www.courts.ri.gov/Interpreters/englishversion/Pages/default.aspx>.

ដើម្បីស្នើសុំការបកប្រែសេចក្តីជូនដំណឹងនេះជាភាសាណាមួយផ្សេងទៀត សូមទូរស័ព្ទមកកាន់ការិយាល័យអ្នកបកប្រែប្រចាំតុលាការតាមរយៈលេខ (401) 222-8710។ វាជាការចាំបាច់ដែលត្រូវមានអ្នកនិយាយភាសាអង់គ្លេសជាមួយលោកអ្នកនៅពេលដែលលោកអ្នកទូរស័ព្ទចូល។

តុលាការ Rhode Island ប្តេជ្ញាធ្វើឲ្យតុលាការអាចប្រើប្រាស់បានសម្រាប់មនុស្សគ្រប់គ្នា។

ការិយាល័យអ្នកបកប្រែប្រចាំតុលាការ
Licht Judicial Complex
Fourth Floor Room 401
250 Benefit Street
Providence, RI 02903

Case Number: PC-2020-05586
 Filed in Providence/Bristol County Superior Court
 Submitted: 8/5/2020 4:28 PM
 Envelope: 2694008
 Reviewer: Victoria H

STATE OF RHODE ISLAND
 PROVIDENCE, SC.

SUPERIOR COURT

Linda Francis,)	
Plaintiff)	
)	
v.)	
)	C.A. NO. P.C. 2020-_____
Family Dollar Stores of)	
Rhode Island, LLC #08425, Alias))	
& Doe 1 Thru Doe 4,)	
Inclusive)	
Defendants)	

COMPLAINT

1. Linda Francis ("Plaintiff") was at all times material hereto a resident of the City of Portsmouth, Rhode Island.
2. Upon information and belief, Defendant, Family Dollar Stores of Rhode Island, LLC, #08425. alias, and/or Defendant, "Doe" (Defendant, "FAMILY DOLLAR") is a Limited Liability Company was at all times material hereto a foreign Limited Liability Company with a principal place of business located in Chesapeake, Virginia 23320. Defendant, FAMILY DOLLAR STORES OF RHODE ISLAND LLC, is licensed to do business in the State of Rhode Island with a place of business located at 601 Medicom Avenue in Warren Rhode Island.
3. Upon information and belief, defendant, Doe 1 Thru Doe 4, Inclusive, (hereinafter, "Doe" the true names and capacities whether Individual, corporate, or otherwise, of the named herein as Doe 1 thru Doe 4, Inclusive, are unknown to the plaintiffs at the present time, the plaintiffs sue said Doe defendants by such fictitious names. Plaintiffs informed and believed and therefore alleged that each of the defendant designated herein by fictitious names are in some manner responsible for the events a happening herein referred to, and caused the damages proximate and foreseeable hereby to the plaintiffs as hereinafter alleged. Plaintiffs will ask leave of the

Case Number: PC-2020-05586
Filed in Providence/Bristol County Superior Court
Submitted: 8/5/2020 4:28 PM
Envelope: 2694008
Reviewer: Victoria H

- Court amend this complaint when the true names and capacities of the "Doe" defendant(s) have been ascertained.
4. Plaintiffs' damages are sufficient to confer jurisdiction in the Superior Court.

FACTS

5. Plaintiff repeats and realleges all previous paragraphs as if set forth herein in full.
6. At all times material hereto, Defendants owned, maintained, and/or controlled property ("the store") located at 601 Metacom Ave, Warren, State of Rhode Island.
7. On or about September 6, 2017, Plaintiff, Linda Francis was lawfully at the store.
8. On or about September 6, 2017, while traversing an aisle in the store, Plaintiff slipped and fell, thereby sustaining severe and permanent personal injuries.

COUNT I

9. The plaintiff repeats, re-alleges, and incorporates by reference as if set forth hereto in their entirety Paragraphs 1 through 8 of this Complaint.
10. Defendant, their agents servants and/or employees owed Plaintiff, Linda Francis a duty to exercise reasonable care for her safety, as she was an individual reasonably expected to be on the premises located at 601 Metacom Avenue in Warren, Rhode Island.
11. Said duty included an obligation to warn of and/or remove any and all dangerous conditions existing at the store once Defendants knew or should have known of the dangerous condition.
12. That it then and there became and was the duty of the said defendant to use reasonable care to maintain the said premises, passageways, aisles, exits, and lanes being used by invitees in a reasonable safe and proper condition for persons, including the plaintiff, Linda Francis, lawfully and property using said premises, passageways, aisles, exists and lanes.

13. Plaintiff, Linda Francis avers that the said defendant, its servants, agents, officers or employees, disregarding said duty, negligently allowed and permitted said premises, passageways, aisles, exits and lanes to be and remain in an unsafe and improper condition thereby creating a dangerous hazard for the defendant's invitees including the plaintiff, Linda Francis, lawfully and rightfully using said premises, parking lot, passageways, aisles, exits and lanes; that said unsafe condition, existed for a long period of time prior to the accident herein complained of; that the defendant, its servants, agents, officers or employees knew of said unsafe condition on said premises, passageways, aisles, exits, or lanes or in the exercise of due care and diligence ought to have known of said condition. Defendant negligently created said dangerous condition and/or permitted said dangerous condition to exist; failed to use reasonable care to warn your plaintiff, Linda Francis of said dangerous condition; failed to make a reasonable inspection to determine the existence of said dangerous condition; failed to use reasonable care to provide your said plaintiff with a safe means of passage and was otherwise negligent and careless.
14. That the plaintiff, Linda Francis, lawfully using said premises, passageways, aisles, exits and lanes and in the exercise of due care and diligence, as aforesaid, was caused to slip, trip, and fall with great force and violence.
15. As a direct result thereof, plaintiff, Linda Francis, sustained severe and permanent injuries and a shock to her nervous system; she suffered and will suffer great pain and agony for a longer period of time; she was and will be unable to perform her usual work and affairs for a long period of time; she was and will be obliged to receive medicines and medical attendance for a long period of time in an endeavor to cure or relieve her injuries and the plaintiff, Linda Francis, was otherwise greatly injured and damaged.
16. Plaintiff, Linda Francis was required to expend great sums of money for her care, cure and treatment of plaintiff, Linda Francis and she will be required to expend great sums of money for her care, cure and treatment in the future and was otherwise injured and damaged.

WHEREFORE, plaintiff, Linda Francis demands judgment against the Defendant, FAMILY DOLLAR, alias, and/or Defendant, "Doe", their

Case Number: PC-2020-05586
Filed in Providence/Bristol County Superior Court
Submitted: 8/5/2020 4:28 PM
Envelope: 2694008
Reviewer: Victoria H

agents, servants, and employees in a sum sufficient to convey jurisdiction upon this Honorable Court, plus interest and costs.

COUNT II

17. The plaintiff repeats, re-alleges, and incorporates by reference as if set forth hereto in their entirety Paragraphs 1 through 16 of this Complaint.
18. Defendant, their agents servants and/or employees owed Plaintiff, Linda Francis a duty to exercise reasonable care for her safety, as she was an individual reasonably expected to be on the premises located at 601 Metacom Avenue in Warren, Rhode Island.
19. Said duty included an obligation to warn of and/or remove any and all dangerous conditions existing at the store once Defendants knew or should have known of the dangerous condition.
20. Defendants breached this duty of care to Plaintiff by its actions, including but not limited to the following: by carelessly and negligently permitting a substance and/or condition to collect or remain on the floor of the aisle in the store where Plaintiff was walking, by carelessly and negligently failing to remove the substance and/or condition, by failing to properly maintain the floors of the store in a clean and safe condition, and in failing to properly and adequately supervise and oversee the store and/or its employees, agents and/or servants so as to prevent the collection of a substance and/or condition on its floors.
21. Said condition existed for a time period such that Defendants, in the exercise of due care, could and should have had such knowledge and notice thereof.
22. The accident and resulting injuries to Plaintiff were caused solely by the negligence of Defendants without any comparative negligence on the part of Plaintiff.
23. As a direct and proximate cause of said breaches of Defendants' duty of care, Plaintiff sustained severe, debilitating, and permanent personal injuries to her whole body and has endured continued pain, anguish, and discomfort.

Case Number: PC-2020-05586
Filed in Providence/Bristol County Superior Court
Submitted: 8/5/2020 4:28 PM
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24. As a further result of Defendants' negligence, Plaintiff was hospitalized, and had extensive expenses for hospital bills, doctors' bills, nurses' fees, and various medicines.

25. As a further result of Defendants' negligence, Plaintiff, Linda Francis has lost considerable monies in the form of loss of earnings and or loss of earning capacity.

WHEREFORE, Plaintiff Linda Francis demands judgment against Defendant, FAMILY DOLLAR, alias, and/or Defendant, "Doe" their agents, servants and/or employees in an amount sufficient to establish the jurisdiction of this Court inclusive of attorneys' fees, statutory interest, costs, and all other and further relief as the Court deems just and proper.

COUNT III

26. The plaintiff repeats, re-alleges, and incorporates by reference as if set forth hereto in their entirety Paragraphs 1 through 25 of this Complaint.

27. Defendants had a duty to ensure that the agents it selected to perform maintenance services on its premises would perform said services with reasonable care.

28. Defendants breached said duty.

29. As a further result of Defendants' negligence, Plaintiff, Linda Francis was hospitalized, and had large expenses for hospital bills, doctors' bills, nurses' fees, and various medicines.

30: As a further result of Defendants' negligence, Plaintiff, Linda Francis has lost considerable monies in the form of lost wages, a loss of earning capacity, and will be unable to engage in gainful employment for the duration of her natural life.

WHEREFORE, Plaintiff, Linda Francis demands judgment against Defendant, FAMILY DOLLAR, alias, and/or Defendant, "Doe" their agents' servants and/or employees in an amount sufficient to establish the jurisdiction of this court inclusive of statutory interest, costs, and all other and further relief as the court deems just and proper.

PLAINTIFF DEMAND A TRIAL BY JURY ON ALL COUNTS.

Case Number: PC-2020-05586
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Plaintiffs,
By her Attorney

/s/Wayne G. Resmini, Esq.
Wayne G. Resmini, Esq. #6373
RESMINI LAW LLC
1022 Reservoir Avenue
Cranston, RI 02910
(401) 751-6655 (Phone)
(401) 751-6282 (Facsimile)

Dated: August 3, 2020

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

Linda Francis,)	
Plaintiffs)	
)	
v.)	
)	C.A. NO. P.C. 2020-_____
Family Dollar Stores of)	
Rhode Island, LLC, #08425, Alias))	
& Doe 1 Thru Doe 4,)	
Inclusive)	
Defendants)	
)	

PLAINTIFFS' JURY TRIAL DEMAND

Now comes the plaintiff, Linda Francis, hereby demand a
trial by jury on all counts of this Complaint

Plaintiffs,
By her Attorney

/s/Wayne G. Resmini, Esq.
Wayne G. Resmini, Esq. #6373
RESMINI LAW LLC
1022 Reservoir Avenue
Cranston, RI 02910
(401) 751-6655 (Phone)
(401) 751-6282 (Facsimile)

Dated: August 3, 2020